Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554 In the Matter of

Annual Assessment of the Status of) MB Docket No. 12-203 Competition in the Market for the Delivery of Video Programming COMMENTS OF

Itasca Community Television, Inc. (dba ICTV).

ICTV provides these comments in response to the above captioned Notice of Inquiry ("NOI"), released July 20, 2012, seeking "data, information, and comment on the state of competition in the delivery of video programming."

ICTV is a small non-profit in northern Minnesota. It is funded, in-part, from funds provided by three small cities and a township (Grand Rapids, Cohasset, LaPrairie and the Town of Harris). These communities are so committed to the idea of a free flow of government and community information via video that they extend 80 percent of the received franchise fees to ICTV to provide the service. In addition, they collect \$1 per subscriber per month to enhance the capital needs of ICTV.

ICTV has a staff of six full-time employees. It regularly covers 12 government meetings and a host of community events. One channel is dedicated to providing a bulletin board of non-profit and community events information 24/7. Franchise and PEG fees provide nearly 50 percent of ICTV's total budget.

ICTV is carried on Mediacom and Paul Bunyan Communication networks and online at watchictv.org. Through these carriers the television channels cover arguably, one of the largest public access areas in the country-from Northome to Keewatin, MN.

1. How many channels does your MVPD operator(s) provide for PEG programming?

Currently, each of the carriers provides three channels, but the agreement in-place allows for up to four.

2. On which tier are these channels placed and is extra equipment required to view them?

Both carriers have the PEG channels on the lower tier and no extra equipment is needed at this time to view them.

3. Are there more or fewer PEG channels carried on MVPD systems than were carried as of June 2010?

No.

4. What data sources exist to track the availability of PEG programming?

Not applicable.

5. PEG programming has been in our community since 1983. It is part of the flow of government proceedings and a reliable source of information. Community leaders are so accustomed to their viewing audience that they often "speak" to the camera to make a point. The governments are all in close proximity and face many of the same financial decisions. It is not unusual to hear references to "watching" another government's meeting when decisions are being discussed in another jurisdiction.

New technologies challenge ICTV to provide content to the viewers. At this point we are not in as threatening of a situation as many other PEG providers, but we can see it coming. If, for example, state franchising went through, we would be sunk. There is no mechanism with state franchising to ensure the level of support ICTV currently gets. Yet, new technologies strain staff to provide traditional cablecast content on top of all the other delivery methods which normally do not come with a revenue stream.

ICTV is fortunate, at this point in time, to sit where the world is not changing as fast as the metro areas and coasts. But we see the temptation of traditional telephone systems and satellite companies to nudge out the cable providers and know that we must stay on our toes.

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